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June 28, 2006

Federal Communications Commission
Marlene H. Dortch
Secretary
445 12th Street, SW
Washington, DC 20554

Re: Telephone Number Portability, WCB Docket No. 95-116

Ms. Dortch:

Pursuant to Section 52.31 (d) of the Commission's Rules, Guam Wireless Telephone Company, LLC, a PCS Broadband GSM operator serving MTA050, Guam and the Commonwealth of the Northern Mariana Islands ("CNMI") under license KNLF-300, doing business as Hafatel, hereby requests that the Chief, Wireless Telecommunications Bureau, waive the 60 day filing requirement for obtaining an extension for the date for implementation of wireless Local Number Portability ("LNP") in CNMI. Hafatel's late filing is due to the failure of Pacific Telecom Inc. ("PTI") Local Exchange Carrier, to adequately inform Hafatel and the other CNMI wireless carriers of their capability and procedures for supporting Wireless LNP.

Until PTI implements the upgrades within the local exchange required for LNP routing, Hafatel is unable to implement Wireless LNP in the CNMI. In support of this request, Hafatel hereby states as follows.

On December 21, 2005 Hafatel received a Bona Fide Request ("BFR") from Guam Cellular and Paging Inc., dba Saipancell Communications ("Saipancell") for implementation of wireless LNP by July 1, 2006.

Hafatel provides GSM service within the CNMI and Guam utilizing a TECOR Switch which has been upgraded for LNP and is currently supporting LNP in Guam.

All CMRS carriers in the CNMI are currently interconnected through PTI as a tandem interconnecting carrier. At present, no direct connections exist between any CNMI CMRS carriers. Traffic between the CNMI wireless carriers is routed through a PTI Tandem switch to the terminating carrier. Local land line and long distance traffic are

also routed through the PTI Tandem Switch. Therefore, the implementation and testing of Wireless LNP in the CNMI cannot begin or even be scheduled until PTI is capable of supporting the required SS7 services and can provide the services as an N-1 carrier.

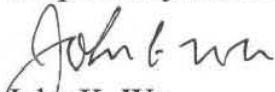
Beginning in March, 2006 Hafatel, and their telecommunications consultant, have been in regular communication with PTI regarding timetables and procedures to implement LNP in the CNMI. PTI has indicated to Hafatel that they are currently unable to support LNP and they intend to request a waiver or extension of time from the Commission for implementing LNP in the CNMI..

On May 31, 2006, PTI sent an email to Tom Gibson of Saipancell (and Guam Cell) indicating that PTI is currently not able to support an LNP implementation and would be filing a waiver with the Commission. At this time, Hafatel has not received a copy of an anticipated PTI Waiver Request to defer implementation of LNP. Furthermore, as of June 23, 2006, 8 days before the LNP implementation date, Hafatel has found no filings by PTI in Docket 95-116 at the Commission's Electronic Comment Filing System requesting a waiver or deferral as stated in the attached emails.

PTI has verbally informed Hafatel that it will be at least 6 months before the local exchange network will be ready for implementing LNP or for beginning of active LNP Testing. Until PTI provides the CNMI telecom industry with its milestones for LNP readiness, Hafatel is unable to provide the Commission with date specific milestones.

Based on the foregoing, Hafatel requests an indefinite delay for wireless LNP implementation in the CNMI. Hafatel will provide the Commission with anticipated implementation dates after it receives implementation information and millstones from PTI.

Respectfully submitted,



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